

1 MICHAEL J. IOANNOU (SBN 95208)  
 2 KEVIN W. ISAACSON (SBN 281067)  
 3 PAULA B. NYSTROM (SBN 329651)  
 4 AMANDA M. OGATA (SBN 354967)  
 5 ROPERS MAJESKI PC  
 6 333 W. Santa Clara St., Suite 930  
 7 San Jose, CA 95113  
 Telephone: 408.287.6262  
 Facsimile: 408.918.4501  
 Email: michael.ioannou@ropers.com  
 kevin.isaacson@ropers.com  
 paula.nystrom@ropers.com  
 amanda.ogata@ropers.com

8 Attorneys for Defendants and Counterclaimants  
 ANALOG DEVICES, INC. and  
 9 MAXIM INTEGRATED PRODUCTS, INC.

10 UNITED STATES DISTRICT COURT  
 11 NORTHERN DISTRICT OF CALIFORNIA

13 NUMBER 14 B.V.,  
 14 Plaintiff,  
 15 v.  
 16 ANALOG DEVICES, INC.; and MAXIM  
 INTEGRATED PRODUCTS, INC.  
 17 Defendants.

18 ANALOG DEVICES, INC.; and MAXIM  
 INTEGRATED PRODUCTS, INC.,  
 19 Counterclaimants,  
 20 v.  
 21 NUMBER 14 B.V., RUDY ESCHAUZIER,  
 and NICO VAN RIJN,  
 22 Counter-Defendants.

Case No.: 5:24-cv-02435-EKL

**DECLARATION OF NICK DERE IN SUPPORT OF DEFENDANTS AND COUNTERCLAIMANTS' MOTION TO RETAIN CONFIDENTIALITY**

Date: May 14, 2025  
 Time: 11:00 a.m.  
 Dept: Courtroom 5, 4th Floor  
 Judge: Hon. Nathanael Cousins

25 I, Nick Dere, declare as follows:

26 1. I am employed at Analog Devices Inc. ("ADI") as the Senior Director of Finance  
 and hereby submit this Declaration in support of Defendants/Counterclaimants' Motion to Retain  
 27 Confidentiality. I have personal knowledge of the facts set forth herein, and if called as a witness,  
 28

1 could and would testify competently hereto.

2       2. I have worked for over nine years in the field of finance. As a Senior Director of  
3 Finance, I have personal knowledge of the purchase requisition process, including the necessary  
4 approval steps, at ADI.

5       3. I am informed that one of ADI's purchase requisition documents was produced to  
6 Plaintiff Number 14, B.V. in response to Number 14's Requests for Production, labelled as  
7 document ADI\_018933 to ADI\_018934 (the "Purchase Requisition").

8       4. I am informed that the Purchase Requisition is a purchase requisition for the  
9 FY2023 royalty payment to be paid to Number 14.

10      5. The Purchase Requisition contains extremely sensitive information about ADI's  
11 internal approval process, including the identities of the relevant approvers and their  
12 respective job titles.

13      6. The Purchase Requisition also contains extremely sensitive information related to  
14 the royalty calculation and the associated royalty payments to Number 14.

15      7. Disclosure of the Purchase Requisition would significantly prejudice ADI, as it  
16 reveals the royalty calculation and royalty payment values, which would give competitors and  
17 other licensors insight into ADI's financial arrangements.

18      8. This could allow competitors to offer more attractive deals to other licensors,  
19 while ADI's current licensors could use the information to demand higher royalty payments.  
20 Revealing this information would unfairly tip the balance in business negotiations, putting ADI at  
21 a significant disadvantage.

22      9. Disclosure of the Purchase Requisition would significantly prejudice ADI, as it  
23 would provide competitors with insight into ADI's internal approval structure for the purchase  
24 requisition, potentially making the company vulnerable to employee poaching.

25      10. Competitors could then target and recruit key employees from ADI, potentially  
26 bypassing the same level of effort and resources that ADI invests in hiring top talent. Specifically,  
27 these employees possess highly confidential financial information about ADI.

28      11. If the Purchase Requisition was made public, it would significantly prejudice ADI

1 by also increasing the risk of data breaches. It would expose the individuals with knowledge  
2 about the company's financials and reveal which employees have access to confidential  
3 information, making ADI more susceptible to security threats.

4           12. The Purchase Requisition is kept confidential within the company and is not  
5 accessible to the public.

6           13. Maintaining the confidentiality of the Purchase Requisition to the fullest extent  
7 possible is necessary to protect ADI's business interests, security interests, and competitive  
8 standing in the marketplace.

9 I declare under penalty of perjury under the laws of the United States of America that the  
10 foregoing is true and correct.

11 Executed this 24 day of March, 2025 at San Jose (city), California (state).



NICK DERE

ROPER  
MAJESKI

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